

Paul G. Shearer  
1532 Meadows Drive  
Lake Oswego, Oregon 97034  
(503) 697-4378

UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA

RECEIVED

APR 06 2007


CLERK, U.S. DISTRICT COURT  
ANCHORAGE, A.K.

PAUL G. SHEARER,	)	
	)	Case No. A03-0263 CV (JKS)
Plaintiff,	)	(Consolidated)
vs.	)	
	)	
UNITED STATES OF AMERICA,	)	
Dirk Kempthorne, Secretary of the )		
Interior, DEPARTMENT OF INTERIOR,	)	
and, NATIONAL PARK SERVICE,	)	
	)	<b><u>PLAINTIFF'S MOTION TO FILE</u></b>
Defendants.	)	<b><u>SECOND AMENDED COMPLAINT</u></b>
_____	)	

Plaintiff Shearer moves the court to file the attached Second Amended Complaint pursuant to Federal Rule 15 and pursuant to the Court Order **Docket No. 78** that dismissed specific Parcels "without prejudice to Shearer pursuing any claims he has to property not covered by section 120 in an appropriate forum" and pursuant to the Court Order **Docket No. 110** dated March 23, 2007, which **GRANTED** Shearer's motion to amend at **Docket No. 103**.

Plaintiff Shearer has amended the Introduction paragraph 1, the Jurisdiction section paragraphs 2 and 3, the Parties section paragraphs 5 and 8, added to the Claims section paragraphs 232 through 242, and amended the Prayer for Recovery section paragraphs 5 and 9.

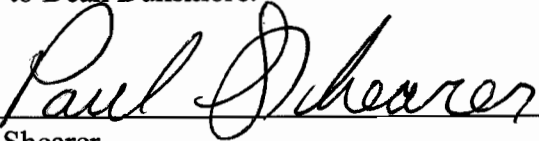
DATED at Lake Oswego, Oregon, this 5 day of April, 2007.

  
\_\_\_\_\_  
Plaintiff  
Paul G. Shearer  
1532 Meadows Drive  
Lake Oswego, Oregon 97034

## CERTIFICATE OF SERVICE

I certify that a copy of the above documents was mailed, by first class mail, addressed to the persons at the addresses stated below on April 5, 2007.

Copy was also sent by email on April 5, 2007 to Dean Dunsmore.

  
\_\_\_\_\_  
Paul G. Shearer

Addressee(s):

US District Court  
Clerk of Court  
222 W. 7<sup>th</sup> Ave #4  
Anchorage, AK 99513-7564  
907-677-6100

(Replacement for: Paul Harison)  
Trial Attorney (copy)  
U.S. Department of Justice  
Environment and Natural Resources Division  
P.O. Box 561 – Ben Franklin Station  
Washington, D.C. 20044  
Email: paul.harrison@usdoj.gov  
202-305-0299  
202-514-8865 FAX

Dean K. Dunsmore (copy)  
U.S. Department of Justice  
Environment & Natural Resources Division  
801 B Street, Suite 504  
Anchorage, AK 99501-3657  
Email: dean.dunsmore@usdoj.gov  
907-271-5452  
907-271-5827 FAX